

ARCO METALS DIVESTITURE

FACILITY SURVEY

1. Plant: Columbia Falls Aluminum Reduction Plant
2. Plant Address: P. O. Box 10, 2000 Aluminum Drive, Columbia Falls,
Montana 59912
3. Plant Telephone Number: (406) 892-3261
4. Plant Manager: Robert A. Sneddon
5. Plant Environmental, Safety and Health Staff:

<u>Name</u>	<u>Title</u>	<u>Telephone Number</u>
Thomas F. Payne	Technical Manager	(406) 892-3261, Ext. 2107
Donald F. Ryan	Technical Superintendent	" Ext. 2908
Kenneth G. Reick	Environmental Supervisor	" Ext. 2907
Clifford J. Kracher	Industrial Hygiene Supervisor	" Ext. 2905
Donald A. Doyle	Safety and Security Coordinator	" Ext. 2932
6. Number of Plant Employees: Salaried 237 Hourly 792
(1985 Budget) Total 1029
7. Year in Which Plant Began Operation: 1955
8. Year When Oldest Currently Operating Unit Began Operation:
August 1955--Potline 1 was energized.
9. Year When Newest Currently Operating Unit Began Operation:
September 1968--Potline 5 was energized.
10. Date of Survey: September 11, 1984

ENVIRONMENT

1. List SIC Codes:
3334
2. List EPA I.D. Numbers: Federal MTD057561763 State _____
3. List all environmental permits, both construction and operating, including process limitations and standards:
RCRA Part A for operation of hazardous waste storage area Montana Groundwater Pollution Control Permit (tentative), for operation of landfills and percolation ponds.
Fluoride emissions limited to 2.6 lbs F/ton Al produced.
Fluoride concentrations in forage plots limited to 50 ppm F per month or 35 ppm F for the grazing season average.
4. List any permit applications or modifications pending or planned:
None
5. List all incidences of permit non-compliance in the past two years, including self-monitored events:
During July and August 1983, fluoride emissions exceeded the state standard. Citations were not issued by the state.
6. List all incidences of enforcement action in the past two years, including compliance action and current status:
None

ENVIRONMENT (cont.)

7. Provide copy of SPCC plan.
Attached See Attachment I.
8. List all off-site disposal facilities used in the past ten years, and list the type and quantity of wastes shipped.
Jerry's Waste Oil Service, 25,000 lbs., used crankcase oil and hydraulic fluids.
Arrcom Oil, 90,000 lbs., mixture of waste gasoline, diesel fuel, paint thinners, and halogenated hydrocarbons (solvents).
Envirosafe Services of Idaho, 30,000 lbs., PCB contaminated articles, coal tar distillate.
Ensco Inc., 6,000 lbs., PCB capacitors.
Beaver Wood Products, 6,000 lbs., used crankcase oil.
9. Describe current status of on-site waste disposal facilities.
Landfill for spent cathode disposal, landfill for plant garbage and construction materials are being permitted under the Montana Groundwater Pollution Control System.
10. Describe impact of any new or proposed environmental regulations and plans to achieve compliance, including engineering manpower and capital requirements.
We are initiating a RCRA Part B application should we be required to have one.
11. Describe any community complaints regarding emissions, noise, odor.
None

SAFETY AND LOSS CONTROL

1. Complete Injury and Illness Report for each of the past five calendar years (Attachment I).

See Attachment II.

2. Describe in detail any fatalities in the past five years.

There have been no fatalities in the last five years.

3. List the dates of any OSHA citations or inspections that have occurred in the past five years, including corrective actions taken and current status.

See Attachment III.

4. List annual Worker's Compensation expenditures for each of the past five years.

1979 -	\$ 405,892.61
1980 -	643,553.35
1981 -	435,935.02
1982 -	426,030.46
1983 -	879,821.12

SAFETY AND LOSS CONTROL (cont).

5. Describe all outstanding Worker's Compensation claims with reserves in excess of \$10,000.

We do not have this information at our disposal here at Arco Aluminum. I have contacted our ESIS representative and she will compile that information, however, will not be able to forward it to me by the 9/11 deadline. This information will be available to me on 9/17. It will then be forwarded to you.

D. A. Doyle

6. Provide copies of the most recent ARCO Loss Prevention Survey.

This facility has never had an Arco Loss Prevention Survey.

We have had visitations on our request by Arco Security & Fire specialists. These inspections helped with strike contingency and program development.

An Arco Safety & Health Review was scheduled and cancelled for 1984.

HEALTH

1. Provide copies of Industrial Hygiene Sampling Data for the past two years.

. Attached is an example of the annual surveys. See Attachment IV.

2. List samples, and describe materials and locations, which indicate potential overexposure within the past two years with OSHA or ACGIH recommended TLV's (including noise).

Areas of potential exposure are given on the list of required respiratory and hearing protection. See Attachment V.

3. List and describe routine medical monitoring.

A urine specimen, part of each physical examination given here at the plant, is sent to industrial hygiene for specific gravity measurement and fluoride concentration determination. Records like the attached are maintained at Medical and Industrial Hygiene.

See Attachment VI.

4. Describe your Industrial Hygiene Sampling Plan.

Evaluation of the working environment is conducted and submitted to management annually. This involves plantwide personal and stationary sampling for: total particulates, benzene soluble hydrocarbons, gaseous/particulate fluorides and noise. Analytical work is performed in our own I. H. laboratory. Worker complaints, new jobs and location changes on old jobs generate investigations, personal monitoring and when necessary, recommendations.

HEALTH (cont.)

5. Based upon Attachment II, list which items have been or are currently used in your facility, including quantity, type of process, potential exposure (number of people and potential exposure levels), and any sampling results.

We have extensive records on coal tar pitch volatiles and asbestos monitoring and to a lesser degree on PCB's, lead/chromium in paint.

Chemicals used at present or in the past are on the attached list.

See Attachment VII.

6. List any OSHA citations in the past five years, including corrective actions taken and current status.

Citations are attached.

See Attachment VIII.

7. Describe any Health Risk Assessments which have been conducted and their results.

See medical attachment.

See Attachment IX.

8. Describe current status of MSDS programs for both purchased stock and manufactured products.

There are MSDS yet to be written for some plant products.

We are presently revising our chemical substance list and related Material Safety Data Sheets.

HEALTH (cont.)

9. Describe plans, with milestone dates, to achieve compliance with the OSHA Hazard Communication Standards.

After updating the chemical substance list, efforts will be turned to preparation of the orientations to be given to plant personnel in 1985.

The written program on Hazard Communication will be completed in 1985 after details of the overall program are ironed out.

Workplace labeling has yet to be addressed.

We will meet the deadline dates as required by the OSHA Hazard Communication Rule.

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